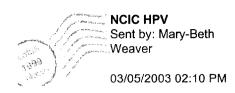
201-14328



To: NCIC HPV, Jodi Burgess/DC/USEPA/US@EPA

cc: cc:

Subject: Public comments on the HPV test plan for silane, dichlorodimethyl

reaction products with silica



Jessica Sandler <jessicas@peta.org> on 03/04/2003 01:22:00 PM

To:

oppt.ncic@epamail.epa.gov, hpv.chemrtk@epamail.epa.gov, Rtk Chem/DC/USEPA/US@EPA, Karen

Boswell/DC/USEPA/US@EPA, Stewart_Miller@cabot-corp.com

cc:

Subject: Public comments on the HPV test plan for silane, dichlorodimethyl reaction products with silica

Attached please find the comments of the U.S. animal protection community on the HPV test plan for silane, dichlorodimethyl reaction products with silica.

Jessica Sandler, MHS Federal Agency Liaison People for the Ethical Treatment of Animals 757-622-7382 ext. 1304 jessicas@peta.org

www.peta.org HPV test plan comments -- Silica surface products.pdf

201-14328

March 4, 2003

Re:

Christine Todd Whitman, Administrator US Environmental Protection Agency Ariel Rios Bldg., Rm. 3000 (1101A) 1200 Pennsylvania Ave., NW Washington, DC 20460 RECEIVED OPPT NOIC

2003 MAR -5 PH 2: 26



501 FRONT STREET NORFOLK, VA 23510 TEL 757-622-PETA FAX 757-622-0457

composed of Cabot Corp., Degussa AG and Wacker-Chemie GmbH

Dear Administrator Whitman:

The following comments are on the test plan for silane, dichlorodimethyl reaction products with silica, prepared by a consortium composed of Cabot Corp., Degussa AG and Wacker-Chemie GmbH (referred to below as the Consortium). These comments are submitted on behalf of People for the Ethical Treatment of Animals, the Physicians Committee for Responsible Medicine, the Humane Society of the US, the Doris Day Animal League, and Earth Island Institute. These animal, health, and environmental organizations have a combined membership of more than ten million Americans.

Comments on the HPV test plan and robust summary for silane,

dichlorodimethyl reaction products with silica, prepared by a consortium

The Consortium's test plan presents a great deal of data from previous studies carried out by Consortium members and other bodies, and on the basis of these data it has appropriately concluded that no additional testing is necessary under the High Production Volume (HPV) Chemical Challenge. We consider it worth noting that the Consortium has decided not to carry out further inhalation toxicity tests, because less than 1% of the commercially available material is respirable. This position is to be commended, and demonstrates the Consortium's appreciation of the October 1999 Agreement among the EPA, industry, and health, environmental and animal-protection organizations, which contains the following statement:

1. In analyzing the adequacy of existing data, participants shall conduct a thoughtful, qualitative analysis rather than use a rote checklist approach. Participants may conclude that there is sufficient data, given the totality of what is known about a chemical, including human experience, that certain endpoints need not be tested.

Thank you for your attention to these comments. I can be reached at 757-622-7382, extension 1304, or via e-mail at <u>JessicaS@PETA.org</u>.

Yours sincerely,

Jessica Sandler, MHS Federal Agency Liaison PETA

Richard Thornhill, PhD
Research Associate
PETA Research and Education Foundation

AN INTERNATIONAL ORGANIZATION DEDICATED TO PROTECTING THE RIGHTS OF ALL ANIMALS